

EXHIBIT P

**Direct Testimony of
Michael Shamos, Ph.D., J.D.
on
Non-Infringement**

How did the inventors describe the invention?

- “Applicants’ claimed invention permits access to complete catalogs, and multiple catalogs from a single source or multiple sources.”

Response to First Office Action
(683 Patent), April 6, 1998

No Indirect Infringement

- Indirect Infringement requires a direct infringer
- There is no Asserted Claim all of whose elements are present or all of whose steps are performed, so no direct infringer can exist
- Therefore, there is no indirect infringement

No Indirect Infringement

- Indirect infringement requires knowledge of the Patents and specific intent to cause infringement
- There is no evidence that Lawson knew of the patents before this lawsuit was filed in May 2009
- After May 2009, Lawson had no specific intent to cause infringement